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April 1, 2008

Via Electronic Mail and FedEx

Thomas C. Williams, LPG  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, Illinois 62794-9276

RE: Addendum to the March 7, 2008 Revised Groundwater Management Zone Application  
2010300074 – Winnebago County  
Southeast Rockford Groundwater Contamination Site  
Superfund/Technical Reports  
CERCLIS ID No. ILD981000417

Dear Mr. Williams:

On behalf of Hamilton Sundstrand Corporation (HSC), SECOR International Incorporated (SECOR) has prepared this response to the Illinois Environmental Protection Agency (Illinois EPA) letter to SECOR dated March 24, 2008 ("the letter"). Per discussions in a March 28, 2008 conference call between Illinois EPA, HSC and SECOR, this response will serve as an Addendum to HSC's March 7, 2008 *Revised Groundwater Management Zone Application* (Revised Application).

Comments from the letter are provided below in italicized font, and the responses are provided in bold text.

1. *"Section 1.1 entitled, Purpose of the GMZ Application, states, 'The purpose of this document is to provide the necessary information for USEPA approval (with concurrence from the "Illinois Environmental Agency", (sic) to establish a three dimensional region containing groundwater being managed to mitigate impairment caused by a release of contaminants from the Site in general accordance with 35 Illinois Administration Code (IAC) Part 620.250.'*

*There are two problems with this statement. First, Illinois EPA, not USEPA, approves the GMZ pursuant to 35 Ill. Adm. Code Part 620. Secondly, the statement that the application is in 'general' accordance with 35 Ill. Adm. Code 620.250 is not acceptable. To state that the application is in 'general' accordance with 35 Ill. Adm. Code 620.250 implies that not all requirements of 35 Ill. Adm. Code 620.250 will be followed. For the Illinois EPA to approve the GMZ application, it must meet all requirements of 35 Ill. Adm. Code 620.250 and other regulatory requirements as further set forth in the Illinois EPA letter to you dated January 16, 2008."*

**HSC acknowledges that while USEPA will be the lead Agency for the CERCLA Remedial Action (RA) activities for the HSC property (Plant #1, or the Site) located within Area 9/10, Illinois EPA is responsible for the GMZ application review, approval, establishment, administration, modification, and final dissolution of the GMZ in accordance with 35 Illinois Administrative Code (IAC) Part 620.250.**

**HSC also acknowledges that all requirements of 35 IAC Part 620.250 must be complied with.**

2. *"Hamilton Sundstrand shall resubmit an application that fully addresses the conditions set forth in the January 16, 2008 letter."*

**Based on the March 28, 2008 discussion, the Revised Application and this addendum fully address the comments in the Agency's January 16, 2008 letter.**

3. *"Section 1.1 of the Revised Application on page 1-2 states: 'This application contains the information to determine the adequacy of controls and the management of the GMZ at the Site associated with the RD and future Remedial Action "RA" activities for the Site.'"*

*"The GMZ application as submitted does not sufficiently explain the 'adequacy of controls'; i.e., it does not include any detail regarding the monitoring groundwater (see section 2.2 (f) of your GMZ application). The GMZ application is a stand alone document and shall include all information required to support approval of the GMZ application."*

**HSC acknowledges that the RA to be undertaken at the Site must address 35 IAC Part 620.250 and 35 IAC Part 725. As such, appropriate groundwater monitoring and implementation of institutional controls will be instituted.**

**The details of the groundwater monitoring to be performed at the site will be specified in the RA Field Sampling Plan (FSP) and Groundwater Monitoring Plan. The current monitoring network and sampling protocols are described in response to Illinois EPA Comment No. 4 below. It is anticipated that these methods will also be used during performance of the RA activities, unless an alternate method is approved by USEPA in consultation with Illinois EPA.**

**Implementation of institutional controls regarding groundwater within the GMZ, and for construction and maintenance of engineered barriers, where necessary, will be part of the RA process. In addition, the City of Rockford has an ordinance which prohibits installation of water wells within a specified distance of municipal water lines. The Site is within this area.**

4. *"Section 2.2 of the revised application describes the proposed monitoring well network for the GMZ. This section also should describe the current monitoring network and sampling protocols."*

**The monitoring network utilized during sampling events conducted in 2004 included 28 wells (SMW-1 through SMW-22, MW127, MW201, MW202, MW203, MW3-FGA, and MW7-FGA).**

**The recent sampling protocols, as referenced in the Remedial Design (RD) FSP, consisted of hand purging and bailing a minimum of three well volumes of standing water in each of the monitoring wells using a disposable plastic bailer and new rope prior to sampling. Groundwater parameters consisting of temperature, pH, and specific conductivity were monitored to confirm these parameters had stabilized prior to sampling.**

5. *"Section 2.2(f) - As previous Illinois EPA comments indicate, groundwater shall be monitored at least semi-annually pursuant to 35 Ill. Adm. Code Part 725, during the time the GMZ is in effect."*

**HSC acknowledges that groundwater shall be monitored at least semi-annually pursuant to 35 IAC Part 725 during the time the GMZ is in effect.**

6. *"Section 2.4(a) mentions soil removal as part of the RD at the loading dock area yet the loading dock area is not previously mentioned as a potential source area. Please make this consistent throughout the document."*

HSC did not consider the Loading Dock a known groundwater source area in the Revised Application because soil impact was observed in shallow (2-4 feet below ground surface) soils only (based on photoionization detector [PID] measurements and results of a deeper sample analyzed at this location). If the Loading Dock is determined in the future to be a groundwater source area it will be identified as such within and proposed for addition to the GMZ.

7. *"Section 2.4(e) - The GMZ will remain in place until the Illinois EPA determines that it is no longer required."*

This comment is acknowledged by HSC, as indicated in the response to Comment No. 1 above.

8. *"In addition, Section 2.4 e does not provide the necessary information to evaluate any future groundwater monitoring at the Site."*

The groundwater monitoring requirements after the completion of the Remedial Action have not yet been developed. However, it is acknowledged that the future groundwater monitoring program for the Site will need to be consistent with the requirements of 35 IAC Part 725.

9. *"Section 2.4(f) is designed to provide information regarding the adequacy of the controls and management of the GMZ; however, there is insufficient information to evaluate this for approval. Specific information, including groundwater monitoring protocols, frequency of groundwater monitoring, frequency of reporting, and the manner in which analytical results will be reported, shall be provided in the final GMZ application."*

The sampling protocols used during the RD consisted of hand purging and bailing a minimum of three well volumes of standing water in each of the monitoring wells using a disposable plastic bailer and new rope prior to sampling. Groundwater parameters consisting of temperature, pH, and specific conductivity were monitored to confirm these parameters had stabilized prior to sampling. These protocols were detailed in the RD FSP. It is anticipated that this method will also be used during performance of the RA activities, which will be specified in the RA FSP, unless an alternate method is approved by USEPA in consultation with Illinois EPA.

The frequency of groundwater monitoring will be provided in the RA Groundwater Monitoring Plan. The monitoring frequency will be at least semi-annually.

GMZ monitoring results will be included in a report to be submitted on a semiannual basis after normal operation of the RA activities begins. The report will be submitted by the end of the quarter following the end of the monitoring period. The reports will be prepared and submitted semiannually or per another mutually agreed upon schedule. The GMZ monitoring reports may coincide with progress reports as required under the CERCLA action and there may be instances where both the GMZ and the progress report may act as the same submission and will at a minimum include:

- A summary of the field activities completed during the period;

- Summary tables of GMZ well groundwater sample analytical data;
- A map showing the analytical results of the GMZ groundwater sampling event at relevant monitoring wells;
- A map indicating groundwater levels and flow direction for each event; and,
- An assessment of remediation progress.

10. *"Section 2.4(g) – Regarding Illinois EPA's role in approving GMZ modifications, see comment 1 above. All requests for modification of any portion of the GMZ shall be made in writing to the Illinois EPA."*

**This comment is acknowledged by HSC, as indicated in the response to Comment No. 1 above.**

11. *"Section 2.5 Point of Compliance--As previously discussed, the Illinois EPA requires that the perimeter of the GMZ be monitored, particularly in the down gradient direction. As such, it may be necessary in the future to add SMW-5, located at the southwest corner of the GMZ, to the GMZ monitoring well network."*

**HSC acknowledges that, depending on certain circumstances, it may be necessary in the future to add SMW-5 to the GMZ monitoring well network.**

Please contact me with any questions you may have on the information presented.

Sincerely,  
SECOR International Incorporated



Keith T. Wilcoxson, PG, CHMM  
Senior Geologist

cc: Shari Kolak, U.S. EPA Region V  
Terry Ayers, Illinois EPA  
Victoria Haines, Hamilton Sundstrand Corporation  
Scott Moyer, United Technologies Corporation  
Earl Phillips, Robinson & Cole  
Richard Fil, Robinson & Cole

## **SOUTHEAST ROCKFORD GROUNDWATER CONTAMINATION SITE**

### **SUPERFUND COOPERATIVE AGREEMENT** **QUARTERLY PROGRESS REPORT**

Assistance ID Number: V005989-01

Site Name: Southeast Rockford Groundwater Contamination

Activity: Remedial Investigation/Feasibility Study

Reporting Period: FFY October 2004, Second Semi-annual Report

#### **1. WORK ACCOMPLISHED DURING REPORTING PERIOD**

1. Responded to request made by Tetra Tech EM. Incorporated on behalf of the City of Rockford regarding the improvements planned along Harrison Avenue.
2. Continued Remedial Design activities for Source Area 4, the former Swabco Manufacturing facility. Activities included review of pre-design analytical results and review of draft design documents. This included submission of a cost estimate and design to US. EPA Region V for Remedial Action funding. Illinois EPA has also written an Explanation of Significant Differences (ESD) to accommodate potential Remedial Design difficulties that could present themselves during implementation of the design. The ESD was designed based upon information that was obtained during the pre-design phase of the design.
3. Worked on issues for obtaining a Grant of Access for Source Area 7 with the PRP of Source Area 7.
4. Conducted pre-design/remedial design activities on Source Area 7 until access was revoked for property owned by PRP. Completed pre-design activities where possible on property owned by Rockford Park district. Worked with U.S. EPA and U.S. DOJ to reestablish access for PRP owned property.
5. Continued oversight activities on Source Area 9/10 for work being performed pursuant to the AOC between United Technologies Corporation/Hamilton Sundstrand (UTC/HS) and U.S. EPA. This included a review of documents submitted by the SECOR on the behalf of UTC/HS and a meeting to discuss the results of pre-design investigation.
6. Worked on issues related to the Nylint property located with Source Area 9/10.
7. Continued work with U.S.Doj and US.EPA on the Source Area 7 related issues regarding case with PRP. This included historical research of documents and the compiling of information for use in the case.

3. Worked on funding issues related to the entire Southeast Rockford Groundwater Contamination Site.

#### **II.A CORRECTIVE MEASURES TAKEN**

None

#### **II.B CORRECTIVE MEASURES PLANNED**

1. Plans are being undertaken to implement the remedial design for source area 4 in the fall of 2005.

### **III. PROJECT SCHEDULE**

PERCENTAGE OF ACTIVITY ACTUALLY COMPLETED: 10 %

PERCENTAGE OF ACTIVITY SCHEDULED TO BE COMPLETED: 90%

EXPLANATION OF SIGNIFICANT SCHEDULING DIFFERENCES:

1. The reluctance of the PRP in Source Area 7 to settle the case with US.Doj and revoking of access to conduct pre-design activities has delayed the design effort several months.
2. The existing building and small business operating in Source Area 4 has caused some rethinking of how to implement the planned Remedial Action in source Area 4. Information collected and issues related to the existing building and the potential issue of needing to preserve that structure provided the need for Illinois EPA to write an ESD for Source Area

### **IV. PROJECT BUDGET**

Tasks/Deliverables	CA Approved Budget Amount	Est. Expenditures 9/30/04 - 04/01/05	Est. Expenditures to 9/30/05
RD/RA	\$750,000	\$98,400	\$500,000-\$1,000,000

TOTAL OPERABLE UNIT Remedial Design:

ACTUAL TIME AND FUNDS REMAINING:

ESTIMATED TIME AND FUNDS NEEDED:

PLANNED FUNDING INCREASE REQUESTS: Funding will be requested for completion of the Remedial Action on Source area 4. Depending upon design of source Area 7 progress, Illinois EPA may request funds from the special account to construct the building that will contain the remedial action equipment. General funding requests may also be made to complete